

SEALED

NORTHERN DISTRICT OF TEXAS

UNITED STATES DISTRICT COURT

for the

Northern District of Texas

United States of America

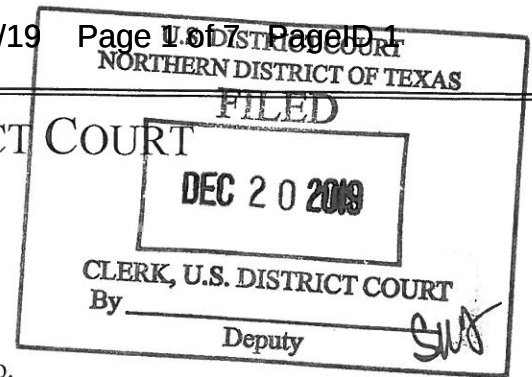
v.

CHRISTOPHER L. REED

Defendant(s)

Case No.

3:19-MJ-1123-BN



CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of December 19, 2019 in the county of Dallas in the
Northern District of Texas, the defendant(s) violated:

Code Section

18 U.S.C. § 1708

Offense Description

Theft or receipt of stolen mail matter by stealing, taking, or abstracting from the mail, letters, postal cards, packages, bags or mail, labeled as U.S. mail and dispatched by USPS in Austin, TX to be delivered to the Indianapolis, IN Mail Processing Annex (MPA)

This criminal complaint is based on these facts:

See attached Affidavit of Postal Inspector Jeffrey Fobbs Jr.

☒ Continued on the attached sheet.

Complainant's signature

Jeffrey Fobbs Jr., Postal Inspector, USPIS

Printed name and title

Sworn to before me and signed in my presence.

Date:

12/20/19

City and state: Dallas, Texas

Judge's signature

DAVID L. HORAN, U.S. Magistrate Judge

Printed name and title

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

UNITED STATES OF AMERICA)
)
VS.)
)
CHRISTOPHER L. REED)

**AFFIDAVIT IN SUPPORT OF
CRIMINAL COMPLAINT**

I, Postal Inspector Jeffrey Fobbs Jr., being duly sworn, depose and state the following is true and correct to the best of my knowledge and belief:

On or about December 19, 2019, in Dallas County, in the Northern District of Texas, Christopher L. Reed, did unlawfully steal, take, or abstract from the U.S. mail letters, postal cards, packages, bags, or mail, in violation of 18 U.S.C. § 1708.

1. I make this affidavit in support of a complaint and application for an arrest warrant. I am a Postal Inspector employed by the United States Postal Inspection Service (USPIS) and have been so employed since February 2014. I am currently assigned to the Dallas Mail Theft/Violent Crimes Team. My responsibilities as a member of the Mail Theft/Violent Crimes Team includes the investigation of mail theft, robberies, burglaries, access device fraud, and identity theft cases involving U.S. mail. The information contained in this affidavit was obtained by me through personal investigation, directly from other investigators and law enforcement officers, and through review of investigators and law enforcement officers written reports of investigation. This information is true and correct to the best of my knowledge and

belief to support the violation of 18 U.S.C. § 1708 (Theft or receipt of stolen mail matter).

FACTS IN SUPPORT OF PROBABLE CAUSE

1. On December 19, 2019 at approximately 3:00 p.m., Postal Inspector Mark Dayhuff spoke by phone with a complainant advising that suspects were unloading U.S. Mail from an 18-wheeler in an alley behind 7544 S. Lancaster Road, Dallas, TX 75241, in the Northern District of Texas. The complainant advised that U.S. Mail was being unloaded from the 18-wheeler trailer into two white cars parked by the trailer and a building next to a carwash where there is a white door facing the alley. I arrived at the location at approximately 3:40 p.m. and located the business strip with the white door facing the alley. I also observed the two white vehicles parked at a car wash. The car wash sign listed the business as, "ROB'S KUSTOM WASH, GODLY CLEAN, 7536 S LANCASTER RD." I conducted surveillance to identify the drivers of those vehicles and observe the business.

2. On or about December 19, 2019 at approximately 4:20 p.m., I observed a white truck tractor (truck used to pull a semi-trailer) pull into the alley displaying the numbers "713" by the driver's door and a decal by the driver's door displaying, "CVT US DOT 2940029 Des Moines, IA." I observed a Black male wearing a black jacket, dark stripe on the sleeves, gray pants, black shoes and low cut black hair exit the truck tractor. This male, later identified as Christopher L. Reed, walked between the two white vehicles at the car wash and spoke to an unknown Black male who exited a dark colored Chevrolet Tahoe wearing a gray

Florida Gators sweatshirt, dark pants and Florida Gators hat. Mr. Reed and the unknown Black male were standing around if waiting for someone. Mr. Reed began to lean on a white Chevrolet Malibu with Texas license plate MRS2680.

3. Mr. Reed and the unknown Black male were approached by an unknown Black male, later identified as "Donny," and Donny exchanged U.S. currency with the unknown Black male in the Florida Gators hat. Donny walked away back towards the business at 7544 S. Lancaster Road, Dallas, TX and the unknown Black male in the Florida Gators hat left. Mr. Reed continued leaning on the Chevrolet Malibu.

4. On December 19, 2019, at approximately 4:25 p.m., Mr. Reed was approached by a Black male wearing a dark colored sweatshirt, same dark color sweatpants and a dark skull cap. This unknown Black male was later identified as Robert Fisher, owner of Rob's Kustom Wash. Fisher and Reed had a conversation at the car wash and both left walking away to their respective vehicles. Reed entered the driver side of the truck tractor and Fisher entered the driver side of a white Chrysler 200 bearing Texas license plate GXS5863. Reed and Fisher exited the car wash parking lot heading northbound on S. Lancaster Road. Reed made a U-turn and drove southbound on S. Lancaster Road and was contacted by U.S. Postal Inspectors at a truck stop at approximately 8181 S Lancaster Road, Dallas, TX.

5. Reed was identified as a United States Post Office (USPS) Highway Contract Route (HCR) driver. Reed stated he left Austin, TX on or about December 19, 2019 at 9:00 a.m. and was in Dallas, TX all day. Reed's paperwork that he

provided U.S. Postal Inspectors indicated that Reed picked up U.S. Mail from the USPS Austin, TX Christmas Annex with 60% of his trailer full of outgoing mail from Austin, TX. The trailer number listed on the USPS Contract Route Extra Trip Authorization form listed the trailer number as 613. The paperwork stated Reed left with his trailer on December 18, 2019 at 5:06 p.m. one-way travel to Indianapolis, IN. Reed took Inspectors to the location where he parked his trailer on an access road near 2519 Cherry Valley Blvd, Dallas, TX. The trailer was found missing the lock/seal on the back door and the load was significantly less than 60% load manifested on the route paperwork provided by Reed. The number listed on the trailer was verified as 613. Reed did not provide an explanation on what happened to the U.S. Mail with which he left Austin, TX and could not explain why the seal was missing from the trailer door.

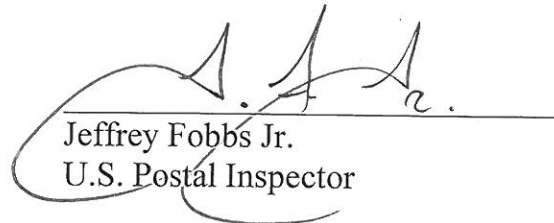
6. I spoke to Fisher, who advised he was working at the carwash when two Black males he know as "Pee-Wee," and "P.A.T.," arrived in the truck tractor pulling the semi-trailer. Fisher stated he did not see any words or numbers on the truck tractor and semi-trailer and believed Pee-Wee and P.A.T. were riding with the driver of the truck tractor. Fisher stated Pee-Wee came to purchase marijuana from him, and Pee-Wee told Fisher the driver of the truck tractor was willing to sell the load on the semi-trailer but they needed somewhere to put it. Fisher stated that he agreed to open the door to a vacant suite next to his new business at 7544 S. Lancaster Road, Dallas, TX (white back door), and Hills Corner Store at 7542 S. Lancaster Road, Dallas, TX. Fisher stated he unlocked the back door, white in color, and watched Pee-Wee, P.A.T.,

and other unknown individuals unload the U.S. Mail from the truck into the empty suite. Fisher admitted he did unload some of the U.S. Mail into the empty suite as well. Fisher was shown a picture of Reed and stated Reed was the person who was just at the car wash in the white truck tractor asking for Pee-Wee. Fisher stated he believed Reed was the driver who came the first time since he asked again for Pee-Wee. Fisher took me back to the empty suite and his business at 7544 S. Lancaster Road, Dallas, TX. Fisher showed how he accesses the empty suite from his business by using a door located on the north wall which allows access into the empty suite and his business. Fisher also showed the back (white) door through which the U.S. mail was loaded, and the door did not have a lock. Fisher was asked how did he unlock the door and Fisher stated that he just opened the door.

7. Several pieces of U.S. mail in other individuals' names with Austin, TX return addresses and mailing dates of December 17, 2019 were observed through the open door. One of the many pieces of U.S. mail was a JPMorgan Chase check #132 mailed by individuals L. and D. K., at a specific house number located on Bankside Street, Austin, TX 78748, to individual E. W. Another piece of U.S. mail was from Despair Inc., 800 Interchange Blvd Ste 102, Austin, TX 78721 to an individual D. S. at a specific location on Preservation Dr., Indianapolis, IN 46278. A third piece of U.S. mail was a parcel found opened and contents removed from LSO 1200 Richcreek Rd., Austin, TX 78757 to 6730 LA Tour Cir, Indianapolis, IN 46278.

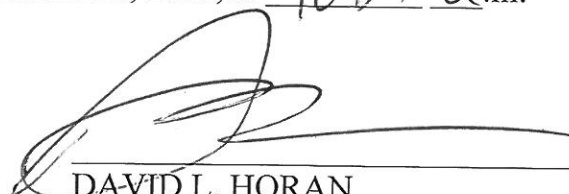
Based upon the foregoing, Affiant believes that Christopher L. Reed violated 18 U.S.C. § 1708 (Theft or receipt of stolen mail matter) by stealing, taking, or

abstracting from the mail, letters, postal cards, packages, bags or mail, labeled as U.S. mail and dispatched by USPS in Austin, TX to be delivered to the Indianapolis, IN Mail Processing Annex (MPA).



Jeffrey Fobbs Jr.
U.S. Postal Inspector

Subscribed and sworn to before me on December 20, 2019, at 10:27 a.m.



DAVID L. HORAN
U.S. Magistrate Judge
Northern District of Texas